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By ECF

June 17, 2021

Hon. Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square, Room 2012
New York, New York 10007

**Re: *Graziano v. First Unum Life Insurance Company*; Case No. 1:21-cv-2708(AJN);
JOINT MOTION FOR ADJOURNMENT OF RULE 16 CONFERENCE**

Dear Judge Nathan:

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Rule 7.1(d), Plaintiff Michael J. Graziano (“Plaintiff”) and Defendant First Unum Life Insurance Company (“First Unum”) respectfully move for an adjournment of the Rule 16 Conference that is scheduled for July 2, 2021 (ECF Doc. No. 8). Per Your Honor’s individual procedures, the Parties have conferred on mutually agreeable alternate conference dates (on Friday afternoons), and are available the afternoons of July 9, July 16 and August 13, 2021.

Good cause exists for this adjournment. The Parties have agreed that First Unum will produce the administrative record to Plaintiff by July 2, in advance of the Rule 16 Conference. The Parties believe production of the administrative record prior to the Rule 16 conference will allow the Parties to have a more meaningful meet and confer, and develop an appropriate case management plan and joint letter in advance of the Rule 16 Conference. Plaintiff consents to and joins in this motion.

Robinson+Cole

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Accordingly, the parties jointly and respectfully request a brief adjournment of the Rule 16 Conference until July 9, July 16 or August 13, 2021. No prior extensions have been requested in this matter.

Respectfully submitted,

/s/ Patrick W. Begos

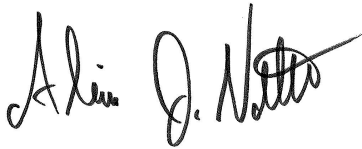
Patrick W. Begos
Robinson & Cole LLP
Counsel for Defendant

Respectfully submitted,

/s/ Matthew Maddox

Matthew Maddox
Riemer Hess LLC
Counsel for Plaintiff

SO ORDERED.



6/22/21

The conference is adjourned to July 9, 2021 at 3:45 P.M.
